

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

|                                |   |                          |
|--------------------------------|---|--------------------------|
| <b>IN RE:</b>                  | § | <b>CASE NO. 24-35761</b> |
|                                | § |                          |
| <b>JETALL COMPANIES, INC.,</b> | § | <b>CHAPTER 11</b>        |
|                                | § |                          |
| <b>ALLEGED DEBTOR.</b>         | § |                          |

**JOINT MOTION OF PETITIONING CREDITORS, UPON CONSENT  
AND WAIVER OF ALLEGED DEBTOR JETALL COMPANIES, INC.,  
TO DISMISS INVOLUNTARY PETITION AGAINST A NON-INDIVIDUAL**

**This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.**

**Represented parties should act through their attorney.**

**There will be a hearing on this motion on Tuesday, February 4, 2025, at 11:00 a.m. (CT) in courtroom 403, 515 Rusk Street, Houston, Texas 77002.**

**TO THE HONORABLE US BANKRUPTCY JUDGE,  
JEFFREY P. NORMAN:**

COME NOW Petitioning Creditors M. Nasr & Partners, PC, EAO Global LLC d/b/a PopLabs, and Ron Madriz (collectively, “Petitioning Creditors”) and, upon consent and waiver of Alleged Debtor Jetall Companies, Inc. (“Jetall” or the “Alleged Debtor”), pursuant to 11 U.S.C. § 303(i) and (j), and Federal Rules of Bankruptcy Procedure 1017(a) and 9014, Move to Dismiss this Involuntary Petition [Docket No. 6] as Supplemented [Docket No. 16] (the “Involuntary Petition”) and to close the above styled and numbered Involuntary Bankruptcy Case (this “Motion to Dismiss”).

1. The Court has jurisdiction over this Involuntary Bankruptcy Case and this Motion to Dismiss pursuant to 28 U.S.C. §§ 1334(a) and (b), and the standing order of reference in the United States District Court for the Southern District of Texas. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (O).

2. Venue is proper in this proceeding pursuant to 28 U.S.C. §§ 1408 and 1409.

3. With the consent of the Alleged Debtor pursuant to 11 U.S.C. § 303(i), and with the Alleged Debtor's waiver of the right to judgment under 11 U.S.C. § 303(i), each of the Petitioning Creditors hereby move to dismiss the Involuntary Petition pursuant to 11 U.S.C. § 303(i) and (j). The Alleged Debtor joins in this Motion to Dismiss to confirm its consent and waiver as set forth in this paragraph 3.

4. In connection with this Motion to Dismiss, each of the Petitioning Creditors aver that: (1) they received nothing, including a promise of future consideration, in return from the Alleged Debtor in return for filing the Involuntary Petition and commencing this Involuntary Bankruptcy Case; and (2) they received nothing, including a promise of future consideration, in return from the Alleged Debtor in return for filing this Motion to Dismiss.

5. As required by 11 U.S.C. § 303(j), this Motion to Dismiss is served upon all known creditors of the Alleged Debtor.

WHEREFORE, Petitioning Creditors M. Nasr & Partners, PC, EAO Global LLC d/b/a PopLabs, and Ron Madriz hereby request that the Bankruptcy Court set this Motion to Dismiss for hearing as required by 11 U.S.C. § 303(j), and thereafter Dismiss the Involuntary Petition, and grant such other and further relief to which they may be justly entitled.

Respectfully submitted,

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By: /s/ Kell C. Mercer  
Kell C. Mercer  
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COUNSEL FOR PETITIONING CREDITORS

ALLEGED DEBTOR:

/s/ Justin Rayome (by permission by Kell C. Mercer)

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COUNSEL FOR THE ALLEGED DEBTOR

### **CERTIFICATE OF SERVICE**

I hereby certify that on January 9, 2025, a true and correct copy of the foregoing pleading was served via regular US Mail or email where reflected by email address on each of the parties on the attached service list, which are all known creditors or parties in interest in connection with Jetall Companies, Inc.

/s/ Kell C. Mercer  
Kell C. Mercer